first off-air primary noncommercial service. Exhibit A at Exhibit #2. All other gains proposed by USC would have to come from translators.

49. Moreover, USC does not currently have an authorization to operate any of the translators relied upon. The K30AA translator construction permit is held by SCC, and the Commission would have to approve an assignment of this translator to USC before USC could use it. More importantly, there are no construction permits held by either USC or SCC for the Durango and Grand Junction proposed translators, which USC relies upon to make its public interest argument. Therefore, not only would these translators offer only a speculative secondary service if authorized, but whether they will ever be authorized is itself a very speculative matter. Therefore, the Durango and Grand Junction translators are doubly speculative and cannot reasonably be relied upon to as a basis for the kind of solid public interest showing upon which the Communications Act requires the Commission to base a rulemaking decision. Finally, as set forth above, many of the persons the Channel Swap Petition claims would receive "first educational service" via translator already have access to educational television via cable service.

III. CONCLUSION

50. The channel swap proposed by USC and SCC clearly is not in the public interest. Therefore, the Commission should rule accordingly and terminate the rulemaking proceeding without adoption of an amendment to the Television Table of Allotments.

WHEREFORE, KKTV, Inc. requests that the Commission find that the proposal of University of Southern Colorado and Sangre de Cristo Communications, Inc. to exchange channels is not in the public interest and to terminate the rulemaking proceeding without adoption of any amendment to the Television Table of Allotments.

Respectfully submitted,

KKTV, INC.

Bar

James L. Winston
Walter E. Diercks
Rubin, Winston, Diercks,
Harris & Cooke
1730 M Street, N.W.
Suite 412
Washington, D.C. 20036
(202) 861-0870

Dated: September 3, 1993

Α

TECHNICAL EXHIBIT IN SUPPORT OF COMMENTS ON PROPOSED RULEMAKING MM DOCKET #93-191 RM 8088 - KOAA/KTSC TELEVISION STATIONS by: KKTV, INC. COLORADO SPRINGS, COLORADO September 1993

Technical Exhibit
TE-1

Bromo Communications, Inc.
P.O. Box 21760 - 1331 Ocean Boulevard, Suite 201
St. Simons Island, Georgia 31522
(912) 638-5608

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TECHNICAL EXHIBIT IN SUPPORT OF COMMENTS ON PROPOSED RULEMAKING MM DOCKET #93-191 RM 8088 - KOAA/KTSC TELEVISION STATIONS by: KKTV, INC. COLORADO SPRINGS, COLORADO September 1993

This Technical Exhibit supports the comments of KKTV,
Inc., in MM Docket #93-191, RM 8088. MM Docket #93-191
requests to swap TV channels 8 and 5 in Pueblo, Colorado,
and redesignate the channels for commercial/non-commercial
service respectively. It is noted that KTSC holds a
construction permit to relocate their transmission facilities
to the north/northwest of their present licensed site.

A detailed population study was conducted to determine the net loss or gain of population receiving primary non-commercial television service as a result of the exchange of television channels and transmission facilities between KTSC and KOAA in Pueblo. The primary off-the-air signal used in this analysis is the Grade 'B' contour as defined in \$73.683(a) of the Commission's rules for the various channels. The population figures are manually extracted from the County, County Subdivision, and Place tabulations from the 1990 U.S. Census.

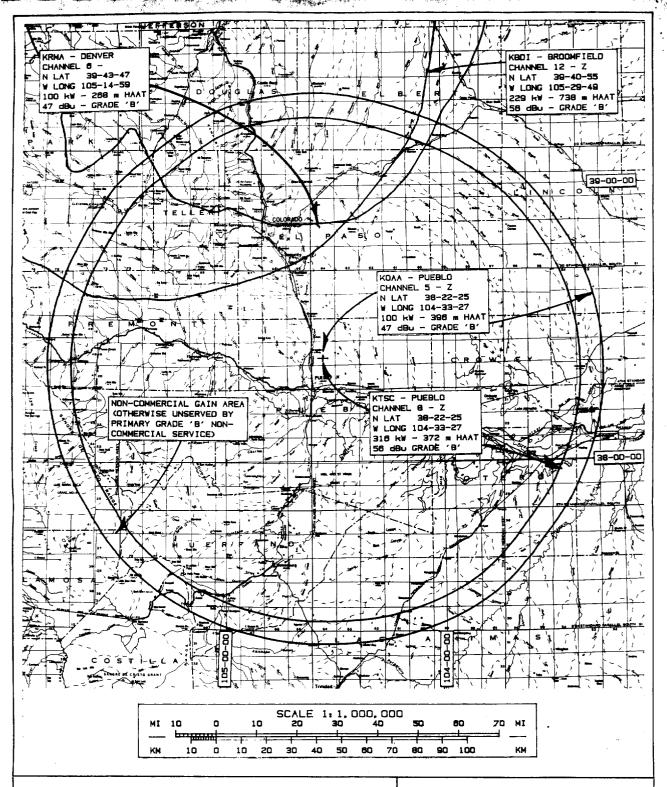
KTSC presently operates on Channel 8. The Channel 8 Grade 'B' contour is 56 dBu (FCC 50/50). KOAA presently operates on Channel 5. The Channel 5 Grade 'B' contour is

47 dBu (FCC 50/50). In analysing this data, we are assuming that KTSC will be operating the KOAA Channel 5 facilities and KOAA will assume operation of the KTSC Channel 8 licensed transmitter facility.

Exhibit #1 is a map of Colorado with the pertinent areas of interest denoted for determining non-commercial service. Only those areas which do not otherwise receive primary, off-the-air non-commercial service are considered in this population loss/gain study. In this analysis, the service area in each county subdivision was determined using a polar planimeter. The area which will gain (or lose) Grade 'B' service was determined, again, using a polar planimeter. The general population served within the appropriate contour was then calculated assuming even distribution of population within the subdivision (excluding the population within the cities, places and CDPs). When appropriate, the population within the city, place and/or CDP was then added back to the general population figure calculated above. The resulting figures were tabulated in Exhibit #2.

Exhibit #3 is a map of Colorado with the pertinent areas of interest denoted for determining commercial service. In a manner consistent with the above analysis, those areas which do not otherwise receive primary, off-the-air commercial service are considered in this population loss/gain study. The resulting figures were tabulated in Exhibit #4.

It is noted that some 2,216 persons stand to lose their only primary, off-the-air commercial service by this exchange of channels.



NON-COMMERCIAL SERVICE CHANGE

MAP IS A PORTION OF THE USGS 1,000,000 SCALE MAP OF 'COLORADO'

CRADE '8' CONTOURS:
CHANNEL 2-6 47 dBu
CHANNEL 7-13 58 dBu
CHANNEL 14-69 64 dBu

EXHIBIT #1

KKTV, INC.

COMMENTS ON RM 8088

MM DOCKET #93-191

CHANNEL EXCHANGE
PUEBLO, COLORADO

SEPTEMBER 1993

BROMO TECHNICAL CONSULTANTS
COMMUNICATIONS

St Simons Island, Georgia

Washington, D.C.

TECHNICAL EXHIBIT IN SUPPORT OF COMMENTS ON PROPOSED RULEMAKING MM DOCKET #93-191

RM 8088 - KOAA/KTSC TELEVISION STATIONS

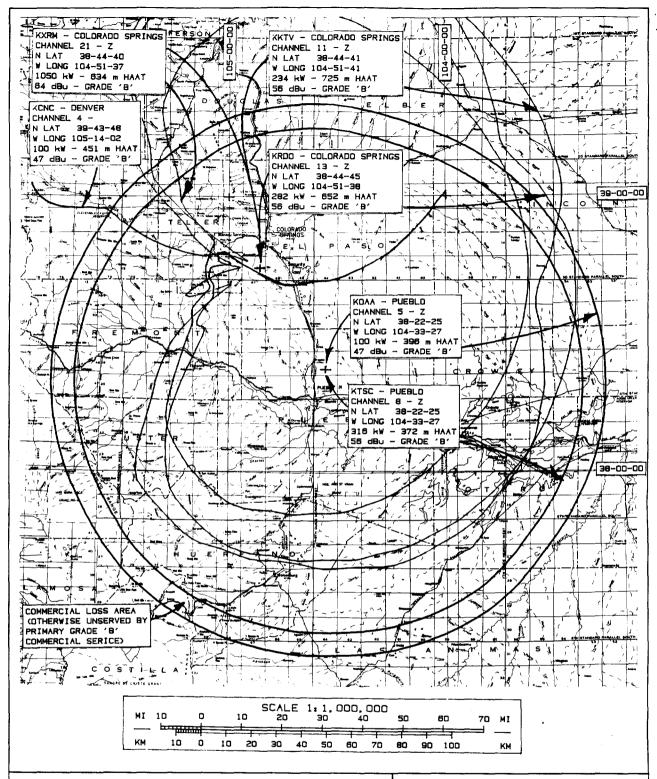
by: KKTV, INC.

COLORADO SPRINGS, COLORADO September 1993

EXHIBIT #2

NON-COMMERCIAL SERVICE GAIN

COUNTY/SUBDIVISION	GAIN
Elbert Simla	603
Lincoln Hugo Karval	43 81
Saguache Saguache	138
Alamosa Mosca-Hooper	308
Costilla Blanca	139
Kiowa Hazwell	15
Bent Las Animas Purgatorie	470 6
Otero Timpas Cheraw	24 29
Las Animas Model Augilar Trinidad	43 591 49
Huerfano Walsenberg La Veta Gardner	57 155 82
Custer Westcliff	24
Freemont Cotopaxi	49
TOTAL GAIN	2906



COMMERCIAL SERVICE CHANGE

MAP IS A PORTION OF THE USGS 1,000.000 SCALE MAP OF 'COLORADO'

GRADE 'B' CONTOURS | CHANNEL 2-6 47 dBu CHANNEL 7-13 56 dBu CHANNEL 14-69 64 dBu

EXHIBIT #3

KKTV, INC.

COMMENTS ON RM 8088

MM DOCKET #93-191

CHANNEL EXCHANGE
PUEBLO, COLORADO

SEPTEMBER 1993



St Simons Island, Georgia

Washington, D.C.

TECHNICAL EXHIBIT IN SUPPORT OF COMMENTS ON PROPOSED RULEMAKING MM DOCKET #93-191

RM 8088 - KOAA/KTSC TELEVISION STATIONS

by: KKTV, INC.
COLORADO SPRINGS, COLORADO
September 1993

EXHIBIT #4

COMMERCIAL SERVICE LOSS

COUNTY/SUBDIVISION	GAIN
Lincoln Karval	37
Saguache Saguache	138
Alamosa Mosca-Hooper	308
Costilla Blanca	139
Kiowa Hazwell	15
Bent Las Animas Purgatorie	470 6
Otero Timpas Cheraw	24 29
Las Animas Model Augilar Trinidad	43 591 49
Huerfano Walsenburg La Veta Gardner	57 155 82
Custer Westcliff	24
Freemont Cotopaxi	49
TOTAL LOSS	2216

AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

State of Georgia)	
St. Simons Island)	SS
County of Glynn)	

RICHARD S. GRAHAM, JR. being duly sworn, deposes and says that he is an officer of Bromo Communications, Inc. Bromo has been engaged by KKTV, Inc., to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He is a graduate of Auburn University and has been active in broadcast engineering since 1972.

The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 2nd day of September, 1993.

Richard S. Graham,

Affiant

Sworn to and subscribed before me this the 2nd day of September, 1993

Notary Public, State of Georgia

My Commission Expires: September 8, 1995

MAR 9 1990

MAR 8 - 1990

MENDMENT

Federal Communications Com Office of the Secretary

The application of the University of Southern Colorado for a construction permit to improve the facilities of noncommercial educational television station KTSC-TV, Pueblo, Colorado (File No. BPET-900122KE) is hereby amended by the submission of the attached "Amendment to Request for Waiver".

Respectfully submitted

UNIVERSITY OF SOUTHERN COLORADO

By.

President, University of Southern Colorado

BV

Tom Aube, Chief Engineer

March $\frac{7}{1990}$

AMENDMENT TO REQUEST FOR WAIVER

This Amendment is submitted in order to clarify and embellish the request for waiver of the requirements of Section 73.610(b) of the Commission's Rules which is contained in Exhibit E-1A. This Amendment addresses the public interest considerations and other matters which support the waiver request, particularly in light of the formal opposition of MST which was filed on February 26, 1990.

The background of the current proposal is of extreme significance. The purpose of this proposal is to provide an adequate signal for the residents of Colorado Springs and its surrounding area from Station KTSC-TV, which is licensed to Pueblo. Pueblo and Colorado springs are considered a hyphenated market (the 99th major market) in the Arbitron listings (see, e.g., Broadcasting Yearbook '89, page C-157). More significantly, Colorado Springs is part of the area which the University of Southern Colorado was created to serve, not only by its broadcast station, but also by the various educational and outreach services which the University provides to that area of the State of Colorado.

The signal of Station KTSC-TV, with its present authorized facilities, partly because of the nature of the intervening terrain, is clearly inadequate to serve Colorado Springs. For this reason, the University has for a number of years operated a translator on Channel 53 to provide such service. The programming of Station KTSC-TV, during this period, has included numerous programs which dealt with Colorado Springs' issues and interests and which featured residents of Colorado Springs.

Unfortunately, the Commission has authorized a new full-power television station to operate on Channel 53 at Castle Rock, Colorado. When this station commences service, the Channel 53 translator will be forced to cease operation. When this prospect became known, the university conducted a thorough search for another UHF channel on which its translator could be operated. There are no such channels available. The University thereupon sought to inaugurate a rule making proceeding to allocate Channel 66 at Colorado Springs on a reserved basis. This effort also failed because the proposal violated the existing major market television freeze. The rule making was sought only after the University had determined that no UHF channel was available at or near Colorado Springs for the creation of a full-power satellite of Station KTSC-TV.

The University was thus confronted with the impending loss of the service which it has provided to Colorado Springs, and the financial support from Colorado Springs residents which is of significant importance to the entire broadcast operation. The instant application appears to provide the only possible mechanism





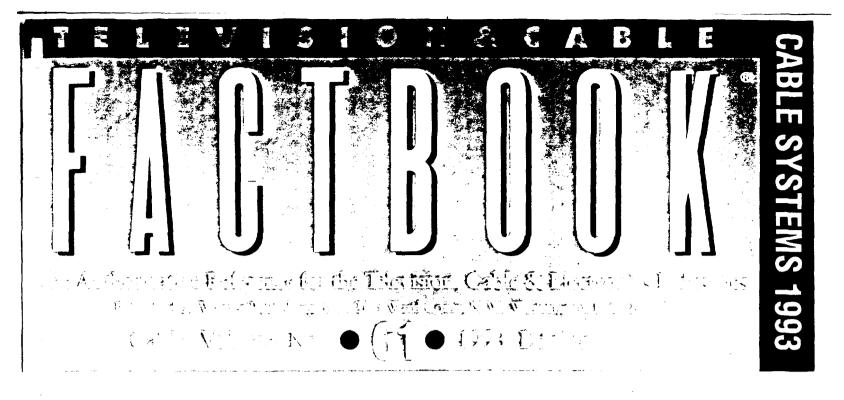
for the University to achieve its basic mission to provide educational service to all of the people of this area.

To serve the Colorado Springs and Pueblo markets with a VHF television signal there are only three site locations that can be considered, because of the local zoning restriction. The first site is the present transmitter site located on Baculite Mesa. This site does not allow sufficient signal penetration to provide adequate signal to the Colorado Springs market. Both Station KOAA—TV, Channel 5, and Station KTSC—TV share this site. Both KOAA and KTSC—TV have had to operate translator stations from Cheyenne Mountain to serve the Colorado Springs market.

1300-foot tall tower site located second site is a approximately 8 miles north of the Baculite Mesa site and approximately 1/2 mile south of the El Paso County line. The City of Colorado Springs is approximately 500 feet higher in elevation than the tall tower site. The distance from the tall tower site to the center of Colorado Springs is approximately 30 miles. The site is not acceptable for two reasons -- first, the distance and elevation differences from Colorado Springs will prevent a signal from this site to be received by the heavily populated areas located behind the many ridges that are a part of the Colorado Springs area; and, second, the fact that a very strong signal would be bounced off of Pikes Peak which is located west of Colorado Springs and received in Colorado Springs, would cause very bad ghosting of that signal in the Colorado Springs area. Even at its present location, Station KTSC's Channel 8 signal in Colorado Springs is very bad in some areas of the city because of this problem. Moving the transmitter and antenna closer to the mountain will only intensify the ghosting problem.

The Cheyenne Mountain site, therefore, is the only adequate site in the area. The antenna pattern has been carefully chosen so that no signal will be radiated toward Pikes Peak and because of the elevation of the site compared to Colorado Springs, a signal will be provided to the heavily populated ridges.

The only disadvantage of the Cheyenne Mountain site would be the high cost of the rent the University will have to pay but, it believes, as all of the renters on Cheyenne Mountain, that it is the only site that will provide the needed location.



Innovative.

Creative.

Responsive.





USA NETWORKS

Once again...setting the standard.

ALABAMA

Total Systems:								
Total Communities Served:								
Franchises Not Yet Operating: .								
Applications Pending:								
Communities with Applications:								
Number of Basic Subscribers: .								
Number of Expanded Basic Subs								
Number of Pay Units:							386	5,647

ABBEVILLE-Vista Communications, Box 8, Headland, AL 36345. Phone: 205-693-2850. County: Henry. Also serves Henry County (portions), Population: N.A. (area served).

TV Market Ranking: Below 100. Original franchise award date: N.A. Franchise expiration date: N.A. Began: N.A.

Channel capacity: 35. Channels available but not in use: N.A.

Basic Service

Subscribers: 1,117 (07/01/91).

Programming (received off-air): WLTZ (N), WRBL (C), WTVM (A) Columbus; WDHN (A), WTVY (C) Dothan; WDIQ (P) Dozier; WDAU (F) Ozark

Programming (via satellite): Learning Channel.

Fee: \$25.00 installation; \$10.95 monthly.

Expanded Basic Service

Subscribers: N.A.

Programming (via satellite): WTBS (I) Atlanta; WGN-TV (I) Chicago; American Movie Classics; Arts & Entertainment, Black Entertainment TV; CNBC; CNN; Comedy Central; Discovery Channel; ESPN; Family Channel; Headline News; Lifetime; MTV; Nashville Network; Nickelodeon: QVC Network: The Weather Channel; Turner Network TV; USA Network: VISIVACTS.

Fee: \$11.00 monthly.

Pay Service 1 Pay Units: N.A.

Programming (via satellite): Cinemax; Disney Channel; HBO.

Fee: \$7.00 monthly (Disney), \$10.00 monthly (Cinemax or HBO).

Manager: Dan Labbe. Chief technician: Arney Robinson,

Ownership: Vista Communications (MSO),

ABERFOIL-See UNION SPRINGS, AL.

ABERNANT-See TUSCALOOSA COUNTY (portions), AL

ADAMSBURG-See FORT PAYNE, AL.

ADAMSVILLE-See FORESTDALE, AL.

ADDISON-St. Clair Cablevision, Box 932. Fayette, AL 35555. Phone: 205-932-7264. County: Winston, Also serves Winston County (eastern portion). Population: N.A. (area served).

TV Market Ranking: 96. Original franchise award date: N.A. Franchise expiration date: N.A. Began: February 1, 1990. Channel capacity: 12, Channels available but

not in use: N.A.

Basic Service

Subscribers: N.A. Programming (received off-air): WBIQ (P), WBRC-TV (A), WTTO (F), WVTM-TV (N) Birmingham; WAAY-TV (A), WHNT-TV (C) Huntsville-Decatur.

Programming (via satellite): WTBS (I) Atlanta; CNN; Discovery Channel; ESPN; Nachville Network

Fee: \$25.00 installation; \$12.95 monthly.

Pay Service 1

Pay Units: N.A.

Programming (via satellite): Cinemax. Fee: \$9.00 monthly.

Manager: Joe Acker, Chief technician; Robert Burgess.

Ownershio: A. D. Management Inc. (MSO). Note: Current information not available.

AKRON-Alabama TV Cable Co., Box 369, 213-B Broad St., Aliceville, AL 35442. Phone: 205-373-8701. County: Hale. Population: 604.

TV Market Ranking: Below 100. Original franchise award date: N.A. Franchise expiration date: N.A. Began: March 1, 1989. Channel capacity: N.A. Channels available but not in use: N.A.

Basic Service

Subscribers: 130 (06/01/89). Programming (received off-air): WVTM-TV (N) Birmingham; WIIQ (P) Demopolis; WTOK-TV (A) Meridian; WCFT-TV (C), WDBB (F) Tuscaloosa.

Programming (via satellite): WTBS (I) Atlanta; CNN; ESPN; Nashville Network; USA Network.

Fee: \$11.95 monthly.

Pay Service 1

Pay Units: 54 (06/01/89). Programming (via satellite): Cinemax. Fee: \$10.00 monthly.

Pay Service 2

Pay Units: 44 (06/01/89). Programming (via satellite): HBO.

Fee: \$10.00 monthly. Manager: John Franklin.

Ownership: Alabama TV Cable Co. (MSO). Note: Current information not available.

ALABASTER-See MONTEVALLO, AL.

ALABASTER-See also PELHAM, AL.

ALBERTVILLE—CableSouth Inc., Box 1185, 200-B 431 North, Albertville, AL 35950. Phone: 205-878-3802. Counties: De Kalb, Etowah & Marshall, Also serves Boaz, Crossville, De Kalb County (southwestern portion), Douglas, Etowah County (por-tions), Geraldine, Lakeview, Marshall County (portions), Mountainboro, Sardis City. Population: N.A. (area served).

TV Market Ranking: Below 100. Original franchise award date: N.A. Franchise expiration date: February 17, 2003. Began: November 1, 1964.

Channel capacity: 36. Channels available but not in use: None.

Racie Service

Subscribers: 9,526 (04/30/92). Programming (received off-air): WBRC-TV (A), WVTM-TV (N) Birmingham; WTJP (f) Gadsden; WAAY-TV (A), WAFF (N), WHIQ (P), WHNT-TV (C), WZDX (F) Huntsville-Decatur

Programming (via satellite): WTBS (I) Atianta; CNN; Comedy Central; Country Music TV; Discovery Channel; ESPN; Family Channel; Headline News; Home Shopping Network; Learning Channel; Lifetime; MTV; Nashville Network; Nickeiodeon; Prevue Guide; The Weather Channel; Turner Network TV; USA Network: Video Hits One.

Current originations: Public access. Fee: \$34.95 installation; \$20.95 monthly.

Pay Service 1

Pay Units: 7.350 (04/30/92).

Programming (via satellite): American Movie Classics; Cinemax; Disney Channel; HBO; Showtime; SportSouth Network. Fee: \$2.50 monthly (SportsSouth), \$3.95 monthly (AMC), \$7.95 monthly (Cinemax or Disney), \$11.95 monthly (HBO or Showtime).

Equipment: Blonder-Tongue, Jerrold & Sci-entific-Atlanta headend; AEL amplifiers; Cerro & Times Fiber cable; Scientific-Atlanta satellite antenna.

Miles of plant: 408.4 (coaxial). Homes passed: 14,950.

Chief technician; Tom Coolidge.

City fee: 4% of gross. Ownership: CableSouth (MSO).

ALEXANDER CITY—Alexander City Cablevision Co. Inc., Box 687, 1602 Taliapoosa St., Alexander City, AL 35010. Phone: 205-234-3456. Counties: Coosa & Taliapoosa. Also serves Coosa County, Jackson Gap, New Site, Taliapoosa County. Population:

TV Market Ranking: Below 100 (portions of Coosa County, Jackson Gap, New Site); Outside TV Markets (Alexander City, portions of Coosa County, Tallapoosa County), Original franchise award date: N.A. Franchise expiration date: N.A. Began: May 1, 1964.

Channel capacity: N.A. Channels available but not in use: N.A.

Basic Service

Subscribers: 6,785 (02/28/91).

Programming (received off-air): WBMG (C), WBRC-TV (A), WTTO (F), WVTM-TV (N) Birmingham; WRBL (C) Columbus; WCOV-TV (F), WHOA-TV (A), WSFA (N) Montgomery; WCIQ (P) Mount Cheana State Park; allband FM.

Programming (via satellite): WTBS (I) Atlanta; WGN-TV (I) Chicago; WWOR-TV (I) New York; C-SPAN; CNBC; CNN; Discovery Channel; ESPN; Family Channel; Headline News; Lifetime; MTV; Nashville Network; New Inspirational Network; Nickelodeon; The Weather Channel; Turner Network TV; USA Network; Video Hits One.

Current originations: Time-weather; bulletin board.

Fee: \$17.90 monthly.

Pay Service 1

Pay Units: N.A.

Programming (via satellite); Disney Channel; HBO; Showtime; The Movie Channel. Fee: \$25.00 installation; \$7.95 monthly (Disney), \$9.95 monthly (Showtime or TMC), \$11.95 monthly (HBO).

Equipment: SKL headend; SKL amplifiers: SKL cable; AFC satellite antenna.

Miles of plant: 78.0 (coaxial). Manager: Gerald Price.

City fee: 3% of gross.

Ownership: McDonald Group (MSO).

ALICEVILLE---Alabama TV Cable Co., Box 369, 213-B Broad St., Aliceville, AL 35442. Phone: 205-373-8701. County: Pickens. Also serves Carrollton. Population: N.A. (area served).

TV Market Ranking: Below 100. Original franchise award date: N.A. Franchise expiration date: January 9, 1994. Began: May 1, 1971,

Channel capacity: 23. Channels available but not in use: N.A.

Basic Service

Subscribers: 2,025 (11/30/88).

Programming (received off-air): WBIQ (P), WBRC-TV (A), WVTM-TV (N) Birmingham: WCBI-TV (C) Columbus; WTOK-TV (A) Meridian; WCFT-TV (C), WDBB (F) Tuscaloosa.

Programming (via satellite): WTBS (I) Atlanta; CNN; ESPN; Family Channel. Fee: \$10.00 installation; \$9.95 monthly; \$3.00 converter; \$10.00 installation, \$1.95 monthly (each additional set).

Expanded Basic Service

Subscribers: 585 (11/30/88).

Programming (received off-air): WTVA (N) Tupelo-Columbus.

Programming (via satellite): Black Entertainment TV; Headline News; Lifetime; MTV; Nashville Network; Nickelodeon; Turner Network TV; USA Network; Video Hits One.

Fee: \$10.00 installation; \$3.00 monthly.

Pay Service 1

Pay Units: 395 (11/30/88). Programming (via satellite): Cinemax.

Fee: \$7.00 monthly. Pay Service 2 Pay Units: 71 (11/30/88). Programming (via satellite): Disney Chan-

Fee: \$7.00 monthly.

Pay Service 3

Pay Units: 338 (11/30/88). Programming (via satellite): HBO. Fee: \$7.00 monthly.

Pay Service 4

Pay Units: 173 (11/30/88). Programming (via satellite); Showtime. Fee: \$7.00 monthly.

Local advertising: Yes. Rates; \$50.00/Min-ute; \$35.00/30 Seconds.

Equipment: Scientific-Atlanta headend: C-COR amplifiers: Times Fiber cable; Scientific-Atianta satellite antenna; Scientific-Atlanta satellite receivers.

Miles of plant: 80.0 (coaxial). Homes

passed: 3,000.

Directory of Cable Systems

Equipment

Makes of non-origination (e.g., headend, amplifiers & cable) in addition to originating & satellite equipment are shown, as provided by system operator.

Subscriber Fee

Charges for installation & monthly service are shown as well as converter charges when separately stated by the system operator.

Plant

Miles of plant in existence are listed; additional miles planned within the next 12 months are specified separately.

Homes passed indicates number of homes passed by cable and currently accessible to cable.

Homes in franchised area indicates number of housing units in area for which system holds franchise.

Franchise Fee

Amount paid by system operator to the franchising authority including percent of gross, flat fee, etc.

Ownership

Officers, titles & percentages are listed as furnished by system operators to Television & Cable Factbook or to the FCC.

All cable system operators are listed in Ownership of Cable Systems in U.S. following this directory.

Interests in broadcasting, manufacturing, microwave, telephone, publishing, etc., are noted.

Recent sales of systems are reported on individual systems as well as in Ownership of Systems.

Information is as supplied by system operators, FCC, Copyright Office, franchise holders, applicants, city officials, equipment makers & other

sources. Though data is frequently incomplete, it is the best obtainable through diligent inquiry.

For statistical tables of cable industry development (1952-1992), originations, largest systems, etc., consult Index at beginning of this Volume.

Maintenance of Directory

This directory may be kept up-to-the-minute each week through subscription to services of Warren Publishing, Inc.'s Television & Cable Update. This Update reports all latest cable applications, franchises, modifications, sales, construction starts, principals, addresses, microwaves, etc., as well as FCC actions & pending applications concerning broadcast TV. For details, contact Warren Publishing, Inc., 2115 Ward Court NW, Washington, DC 20037. Phone: 202-872-9200. Fax: 202-293-3435.

Cable & Station Coverage Atlas

Warren Publishing's Cable and Station Coverage Atlas is designed to provide a quick, portable guide to: (1) Communities and areas in relation to the predicted coverage of all TV stations, as expressed by Grade B contours. (2) 35-Mile and 55-Mile Zone Maps, depicting areas within 35 & 55 miles of all TV markets, as employed by the Federal Communications Commission in its cable rules.

The Cable & Station Coverage Atlas also contains the latest amendments & complete text of FCC Rules and Standards for Cable operation; copyright rules pertaining to cable systems; list of Top-100 system operators; attorneys and engineers specializing in communications issues; management & technical consulting firms; brokerage firms.

Market Research & Data Sales

For organizations requiring extensive tabulations & analyses of cable data and surveys beyond the scope of this directory, and requiring updated information obtained since publication of this directory, Market Research & Data Sales provides specialized data and individual studies. For details, contact Market Research & Data Sales, 2115 Ward Court NW, Washington, DC 20037. Phone: 202-872-9200. Fax: 202-293-3435.

Programming (via satellite): Cinemax. Fee: \$19.95 installation; \$10.95 monthly.

Pay Service 2

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A. (a

Pay Units: 170 (02/01/92).

Programming (via satellite): Disney Channel.

Fee: \$10.95 monthly.

Pay Service 3

Pay Units: 932 (02/01/92). Programming (via satellite): Encore. Fee: N.A.

Pay Service 4

Pay Units: 606 (02/01/92). Programming (via satellite): HBO. Fee: \$11.95 monthly.

Pay Service 5

Pay Units: 228 (02/01/92).

Programming (via satellite): Showtime. Fee: \$11.95 monthly.

Program Guide: The Cable Guide.

Equipment: Jerrold headend; Jerrold amplifiers; Times Fiber & Vikoa cable; MSI character generator; Jerrold set top converters; Jerrold addressable set top converters; Pico traps; Scientific-Atlanta satellite antenna; Scientific-Atlanta satellite receiv-

Miles of plant: 52.6 (coaxial). Homes passed: 5,103. Total homes in franchised area: 5,103.

Manager: Jim Gable. Chief technician: James Comiskey.

City fee: 3% of basic gross.

Ownership: Tele-Communications Inc. (MSO).

GOLDEN-See LAKEWOOD, CO.

GRANADA—Vantage Cable Assoc. L.P., Suite 200, 2708 Grand Ave., Des Moines, IA 50312. Phone: 515-243-2441. County: Prowers. Population: 557.

TV Market Ranking: Outside TV Markets.
Original franchise award date: N.A. Franchise expiration date: March 14, 2008.
Began: N.A.

Channel capacity: 36. Channels available but not in use: 20.

Basic Service

Subscribers: 125 (11/30/91).

Programming (received off-air): KCNC-TV (N), KMGH-TV (C), KUSA-TV (A), KWGN-TV (I) Denver.

Programming (via satellite): WTBS (I) Atlanta; CNN; Discovery Channet; ESPN; Family Channet; Nashville Network; Turner Network TV; USA Network; Univision. Fee: \$30.00 installation; \$18.95 monthly.

Pay Service 1

Pay Units: 49 (11/30/91).

Programming (via satellite): Disney Chan-

Fee: \$4.95 monthly.

Pay Service 2

Pay Units: 52 (11/30/91).

Programming (via satellite): HBO. Fee: \$9.95 monthly.

Homes passed: 181.

Manager: Mary Jones. Chief technician: Mike Salenski, Marketing director: Rebecca Sides.

Ownership: Vantage Cable Assoc. Inc. (MSO).

GRANBY—Heritage Communications Inc., Box 439, Avon, CO 81620-0439. Phone: 303-887-2175. County: Grand. Also serves Grand County, Grand Lake, Hot Sulphur Springs, Silver Creek, Population: N.A. (area

TV Market Ranking: Outside TV Markets.
Original franchise award date: N.A. Franchise expiration date: N.A. Respective

chise expiration date; N.A. Began; N.A. Channel capacity; 22. Channels available but not in use; 2.

Basic Service

Subscribers: 3,322 (07/09/92).
Programming (via satelite): WTBS (I) Atlanta; WGN-TV (I) Chicago; KCNC-TV (N), KMGH-TV (C), KRMA-TV (P), KUSA-TV (A), KWGN-TV (I) Denver, Arts & Entertainment; CNN; ESPN; Family Channet;

MTV; Nashville Network; Nickelodeon; Turner Network TV; USA Network. Fee: \$60.00 installation; \$19.79 monthly.

Pay Service 1

Pay Units: 140 (02/01/92).

Programming (via satellite): Cinemax. Fee: N.A.

Pay Service 2

Pay Units: 99 (02/01/92).

Programming (via satellite): Disney Channel.

Fee: N.A.

Pay Service 3

Pay Units: 458 (02/01/92). Programming (via satellite): HBO. Fee: N.A.

Miles of plant: 8.5 (coaxial). Homes passed: 4.334.

Manager: Stan McKinsie.

Ownership: Tele-Communications Inc. (MSO).

GRAND COUNTY-See GRANBY, CO.

GRAND JUNCTION—UAE, 2502 Foresight Circle, Grand Junction, CO 81505. Phone: 303-242-6746. County: Mesa. Also serves Fruita, Mesa County, Palisade. Population: 82.000.

TV Market Ranking: Below 100. Original franchise award date: March 1, 1966. Franchise expiration date: N.A. Began: October 1, 1966.

Channel capacity: 35. Channels available but not in use: 1.

Basic Service

Subscribers: 23,529 (07/09/92).

Programming (received off-air): KJCT-TV (A), KREX-TV (C,N) Grand Junction; 14 FMs.

Programming (via microwave): KCNC-TV (N), KRMA-TV (P), KUSA-TV (A) Denver. Programming (via satellite): WTBS (I) Atlanta; Arts & Entertainment; C-SPAN; CNBC; CNN; Family Channet; Headline News; Lifetime; MTV; Nashville Network; Nickelodeon; Nostalgia Television; QVC Network; Trinity Bcstg. Network; VSN/ACTS; Video Hils One.

Current originations: Time-weather; bulletin board; public service announcements. Planned originations: Channel guide; classified ads; public access; educational access; government access; library access; program guide.

Fee: \$60.00 installation; \$18.25 monthly.

Expanded Basic Service

Subscribers: 22,727 (07/09/92).

Programming (via satellite): American Movie Classics; C-SPANII; Country Music TV; Discovery Channel; ESPN; Prime Sports Network; Turner Network TV; USA Network.

Fee: \$1.25 monthly.

Pay Service 1

Pay Units: 15,750 (02/15/91).
Programming (via satellite): Cinema

Programming (via satellite): Cinemax. Fee: \$14.95 installation; \$9.95 monthly.

Pay-Per-View

Addressable homes: 3,250 (01/01/91). Request TV; Request 2; Special events. Fee: \$3.99.

Local advertising: Yes (locally produced & insert). Available in satellite distributed & character-generated programming.

Equipment: RCA & Scientific-Atlanta headend; Jerrold & Magnavox amplifiers; Times Fiber cable; Texscan character gen-

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erator; Jerrold set top converters; Jerrold addressable set top converters; Andrew satellite antenna; Andrew & Anixter-Pruzan satellite receivers; MSI & Texscan commercial insert.

Miles of plant: 592.0 (coaxial). Homes passed: 38,522. Total homes in franchised area: 42,022.

Manager: Tom Worster. Chief technician: Glen Vancil.

City fee: 2.5% of gross.

Ownership: Tele-Communications Inc. (MSO).

GRAND LAKE—See GRANBY, CO.

GREELEY—UAE, 3737 W. 10th St., Greeley, CO 80634. Phone: 303-629-9626. Fax: 303-353-4363. County: Weld. Also serves Evans, Garden City, La Salle, Weld County (portions). Population: N.A. (area served).

TV Market Ranking: Below 100 (Evans, Garden City, La Salle, Weld County); Outside TV Markets (Greeley). Original franchise award date: N.A. Franchise expiration date: March 31, 1994. Began: November 1, 1980.

Channel capacity: 36. Channels available but not in use: None.

Basic Service

Subscribers: 15,291; Commercial subscribers: 18 (07/09/92).

Programming (received off-air): KBDI-TV (P) Broomfield; KGWN-TV (C) Cheyenne; KCNC-TV (N), KDVR (F), KMGH-TV (C), KRMA-TV (P), KTVD (I), KUSA-TV (A), KWGN-TV (I) Denver.

Programming (via satellite): WTBS (I) Atlanta; WGN-TV (I) Chicago; Arts & Entertainment; C-SPAN; Cornedy Central; Electronic Program Guide; Family Channel; Headline News; Learning Channel; Lifetime; MTV; Nashville Network; Nickelodeon; QVC Network; The Weather Channel; Trinity Bostg. Network; Univision; Video Hits One.

Current originations: Channel guide; bulletin board; classified ads; public access; educational access; leased access; emergency alert; local sports.

Fee: \$60.00 installation; \$19.50 monthly; \$2.95 converter; \$29.95 installation, \$2.95 monthly (each additional set).

Expanded Basic Service

Subscribers: 14,737 (07/09/92).
Programming (via satellite): American
Movie Classics; CNBC; CNN; Discovery
Channel; El Entertainment TV; ESPN;
Prime Sports Network; Turner Network TV;

USA Network. Fee: \$1.45 monthly.

Pay Service 1

Pay Units: 3,208 (01/01/90). Programming (via satellite): Cinemax. Fee: \$14.95 installation; \$7.95 monthly.

Pay Service 2

Pay Units: 2,060 (01/01/90). Programming (via satellite): Disney Chan-

Fee: \$14.95 installation; \$7.95 monthly.

Pay Service 3

Pay Units: 1 ().

Programming (via satellite): Encore. Fee: N.A.

Pay Service 4

Pay Units: 4,883 (01/01/90). Programming (via satellite): HBO. Fee: \$14.95 installation; \$7.95 monthly.

Pay Service 5

Pay Units: 2,293 (01/01/90).

Programming (via satellite): Showtime. Fee: \$14.95 installation; \$7.95 monthly.

Local advertising: Yes (locally produced & insert). Available in satellite distributed & locally originated programming. Rates: \$22.00/Minute; \$11.00/30 Seconds. Local sales manager: Shelley Costigan.

Equipment: Scientific-Atlanta headend; Scientific-Atlanta amplifiers; M/A-Com & CommyScope cable; J/C cameras; Sony VTRs; Telemation character generator; Jerrold set top converters; Comsonics & Vitek traps; Scientific-Atlanta satellite antenna; Scientific-Atlanta satellite receivers.

Miles of plant: 254.2 (coaxial). Additional miles planned: 3.0 (coaxial). Homes passed: 30,446. Total homes in franchised area: 30,446.

Manager: Kathryn Stewart. Chief technician: John Harris.

City fee: 8% of gross.

Ownership: Tele-Communications Inc. (MSO).

GREEN MOUNTAIN FALLS—See COLO-RADO SPRINGS, CO.

GREENWOOD VILLAGE—See DENVER (suburbs), CO.

GUNBARREL-See BROOMFIELD, CO.

GUNNISON—Gunnison CableVision, Box 1312, Gunnison, CO 81230. Phone: 303-641-6023. County: Gunnison. Also serves Crested Butte, Gunnison County, Mount Crested Butte, Riverbend, Skyland. Population: 5,785.

TV Market Ranking: Outside TV Markets. Original franchise award date: N.A. Franchise expiration date: May 3, 1998. Began: March 1, 1984.

Channel capacity: 64. Channels available but not in use: 28.

Basic Service

Subscribers: 1,893 (03/01/89). Programming (received off-air): KREX-TV (C,N) Grand Junction; 8 FMs.

Programming (via microwave): KCNC-TV (N), KMGH-TV (C), KRMA-TV (P), KUSA-TV (A), KWGN-TV (I) Denver.

Programming (via satellite): WTBS (I) Atlanta; WGN-TV (I) Chicago; WWOR-TV (I) New York; C-SPAN; CNBC; CNN; Discovery Channel; ESPN; Family Channel; Home Shopping Network; Lifetime; MTV; Nashville Network; Nickelodeon; The Weather Channel; USA Network; Video Hits One

Current originations: Time-weather, charnel guide; public access; educational access; government access; library access; public service announcements.

Fee: \$30.00 installation (aerial), \$40.00 (underground); \$18.00 monthly; \$10.00 installation, \$5.00 monthly (each additional set).

1993 Edition

Fee: \$25.00 installation: \$11.95 monthly.

Pay Service 6

Pay Units: 292 (01/01/92). Programming (via satellite): Showtime. Fee: \$25.00 installation; \$11.95 monthly.

Pay-Pay-View Request TV.

Local advertising: Yes. Available in locally originated programming.

Program Guide: The Cable Guide. Equipment: Scientific-Atlanta headend:

Theta-Com & Texscan amplifiers; Times Fiber & Comm/Scope cable: Video Data Systems character generator: Jerrold, Regency & Pioneer set top converters: Simulsat satellite antenna: Standard Communications satellite receivers.

Miles of plant; 39.3 (coaxial). Homes passed: 6,377. Total homes in franchised area: 6.377.

Manager: Stan McKinsie. City fee: 3% of gross.

Ownership: Tele-Communications Inc. (MSO).

DOLORES—TCI Cablevision of Durango Inc., Box 1097, Durango, CO 81301-5133. Phone: 800-367-4799. County: Montezuma. Population: 802.

TV Market Ranking: Outside TV Markets. Original franchise award date: N.A. Franchise expiration date: January 1, 1993. Began: January 1, 1983.

Channel capacity: 21. Channels available but not in use: None.

Basic Service

Subscribers: 265 (07/09/92).

Programming (received off-air): KNME-TV (P), KOAT-TV (A), KOB-TV (N), KROE (C) Albuquerque; KCNC-TV (N), KMGH-TV (C), KWGN-TV (I) Denver.

Programming (via satellite): WTBS (I) Atlanta: WGN-TV (I) Chicago; CNN: Discovery Channel; ESPN; Family Channel; MTV; Nashville Network; Nickelodeon; Turner Network TV; USA Network.

Fee: \$20.00 installation; \$17.60 monthly.

Pay Service 1

Pay Units: 21 (11/30/91).

Programming (via satellite); Disney Chan-

Fee: \$10.00 installation; \$10.50 monthly.

Pay Service 2

Pay Units: 55 (11/30/91). Programming (via satellite): HBO. Fee: \$10.00 installation; \$11.45 monthly.

Pay Service 3

Pay Units: 30 (11/30/91).

Programming (via satellite): The Movie Channel.

Fee: \$10.00 installation; \$10.50 monthly. Local advertising: No.

Equipment: Magnavox amplifiers; Times Fiber cable.

Miles of plant: 7.0 (coaxial). Homes passed: 500. Total homes in franchised area: 500. Manager: Keith Swain.

City fee: 3% of basic gross.

Ownership: Tele-Communications Inc. (MSO). Purchased from American Televenture Corp., 1992.

DOUGLAS COUNTY (portions)-See DENVER (suburbs), CO.

DOVE CREEK—TCI Cablevision of Colorado inc., Box 1097, Durango, CO 81301-5133. Phone: 800-367-4799. County: Dolores. Population: 826.

TV Market Ranking: Outside TV Markets. Original franchise award date: June 20, 1988. Franchise expiration date: June 20, 2003. Began: September 1, 1989.

Channel capacity: 35. Channels available but not in use: 16.

Basic Service

Subscribers: 166 (07/09/92).

Programming (received off-air): KCNC-TV (N), KMGH-TV (C), KRMA-TV (P), KUSA-

TV (A), KWGN-TV (I) Denver.
Programming (via satellite): WTBS (I) Attanta: WGN-TV (I) Chicago: CNN; Country Music TV: Discovery Channel; ESPN: Family Channel; Nashville Network; Nickelodeon: USA Network; Video Hits One, Fee: \$20.00 installation; \$17.60 monthly.

Pay Service 1

Pay Units: 12 (11/30/91).

Programming (via satellite): Disney Chan-

Fee: \$10.50 monthly.

Pay Service 2

Pay Units: 30 (11/30/91). Programming (via satellite): H80. Fee: \$11.45 monthly.

Pay Service 3

Pay Units: 16 (11/30/91).

Programming (via satellite): The Movie Channel.

Fee: \$10.50 monthly.

Equipment: Pico & M/A-Com headend: Magnavox amplifiers: Times Fiber cable: Jerrold set top converters; Pico traps: Comtech satellite antenna; Pico & M/A-Com satellite receivers.

Miles of plant: 9.0 (coaxial). Homes passed: 386. Total homes in franchised area: 386.

Manager: Keith Swain. City fee: 3% of gross.

Ownership: Tele-Communications Inc. (MSD). Purchased from American Televenture Corp., 1992.

DOWD JUNCTION—Heritage Communications Inc., Box 439, Avon, CO 81620-0439. Phone: 303-949-5530. Counties: Eagle & Summit. Also serves Vail. Population: N.A. (area served).

TV Market Ranking: Outside TV Markets, Original franchise award date: N.A. Franchise expiration date: N.A. Began: February 1, 1969.

Channel capacity: 39. Channels available but not in use: None.

Subscribers: 7,546 (07/09/92).

Programming (received off-air): KCNC-TV (N), KMGH-TV (C), KRMA-TV (P), KUSA-TV (A), KWGN-TV (I) Denver.

Programming (via satellite): WTBS (I) Atlanta; WGN-TV (I) Chicago; Arts & Entertainment; C-SPAN; CNN; Discovery Channel; Family Channel; FoxNet; Headline News; Lifetime; MTV; Nashville Network; Nickelodeon; The Weather Channel. Fee: \$20,68 monthly.

Expanded Basic Service

Subscribers: 5,194 (07/09/92).

Programming (via satellite): American Movie Classics; CNBC; ESPN; Prime Sports Network; QVC Network; Turner Network TV: USA Network. Fee: \$1.75 monthly.

Pay Service 1

Pay Units: 384 (01/01/92). Programming (via satellite): Cinemax.

Fee: N.A. Pay Service 2

Pay Units: N.A.

Programming (via satellite): Digital Music Express.

Fee: N.A. Pay Service 3

Pay Units: 272 (01/01/92).

Programming (via satellite): Disney Chan-

Fee: N.A.

Pay Service 4

Pay Units: 1,234 (01/01/92). Programming (via satellite): Encore. Fee: N.A.

Pay Service 5

Pay Units; 826 (01/01/92). Programming (via satellite): HBO. Fee: N.A.

Pay Service 6

Pay Units: 299 (01/01/92).

Programming (via satellite): The Movie

Fee; N.A.

Pay Service 7

Pay Units: 317 (01/01/92). Programming (via satellite): Showtime.

Pay-Per-View

Request TV.

Miles of plant: 55.5 (coaxial). Homes passed: 8,160. Total homes in franchised area: 8.160.

Manager: Stan McKinsie.

Ownership: Tele-Communications Inc. (MSO).

DOWNIEVILLE-See EMPIRE, CO.

DUMONT--See EMPIRE. CO.

DURANGO—TCI Cablevision of Durango Inc., Box 1097, Durango, CO 81301-5133. Phone: 303-247-2681. County: La Plata. Also serves La Plata County, Population:

TV Market Ranking: Below 100, Original franchise award date: N.A. Franchise expiration date: November 4, 1990. Began: December 1, 1954.

Channel capacity: 35, Channels available but not in use: None.

Basic Service

Subscribers: 4,481 (07/09/92). Programming (received off-air): KREZ-TV

(C,N) Durango; KOBF (N) Farmington; 1 FM. Programming (via microwave): KNME-TV (P), KOAT (A), KRQE (C) Albuquerque. Programming (via translator): KGSW-TV

(F) Albuqureque. Programming (via satellite): WTBS (I) Atlanta; WGN-TV (I) Chicago; KCNC-TV (N), KRMA-TV (P), KUSA-TV (A), KWGN-TV (I) Denver; Arts & Entertainment; C-SPAN; CNBC; CNN; Discovery Channel; Family Channel; Lifetime; MTV; Mind Extension U; Nashville Network; Nickelodeon; QVC Network; The Weather Channel

Fee: \$60.00 installation; \$17.80 monthly.

Expanded Basic Service

Subscribers: 3,896 (07/09/92). Programming (via satellite): American Movie Classics; Court TV; ESPN; Turner Network TV; USA Network. Fee: \$1.50 monthly.

Pay Service 1

Pay Units: 350 (02/01/92).

Programming (via satellite): Cinemax. Fee; \$25.00 installation; \$10.95 monthly.

Pav Service 2

Pay Units: 256 (02/01/92). Programming (via satellite): Disney Chan-

Fee: \$25.00 installation; \$10.95 monthly.

Pay Service 3

Pay Units: 2,004 (02/01/92). Programming (via satellite): Encore. Fee: N.A.

Pay Service 4

Pay Units: 898 (02/01/92). Programming (via satellite): HBO. Fee: \$25.00 installation: \$11.95 monthly.

Pay Service 5

Pay Units: 352 (02/01/92). Programming (via satellite): Showtime, Fee: \$25.00 installation; \$11.95 monthly. Program Guide: The Cable Guide.

Equipment: Jerroid & Scientific-Atlanta headend: Jerrold & Scientific-Atlanta amplifiers: Times Fiber cable; Jerrold & Scientific-Atlanta set top converters; Jerrold addressable set top converters; Vitek traps; Scientific-Atlanta satellite antenna. Miles of plant: 56.9 (coaxial). Homes passed: 5,722. Total homes in franchised

area: 5.722. Manager: Keith Swain. City fee: 2.5% of basic gross.

Ownership: Tele-Communications Inc. (MSO).

DURANGO WEST-TCI Cablevision of Durango Inc., Box 1097, Durango, CO 81301-5133. Phone: 800-367-4799. County: La Plata. Also serves Pinetop-Durango West. Population: N.A. (area served).

TV Market Ranking: Below 100. Original franchise award date: N.A. Franchise expiration date: N.A. Began: January 1. 1983

Channel capacity: 22. Channels available but not in use: N A

Basic Service

Subscribers: 288 (07/09/92). Programming (received off-air): KREZ-TV (C,N) Durango; KOBF (N) Farmington. Programming (via satellite): WTBS (I) At-lanta; WGN-TV (I) Chicago; KMGH-TV (C), KRMA-TV (P), KUSA-TV (A) Denver;

CNN; Discovery Channel; ESPN; Family Channel; Nashville Network; Nickelodeon; USA Network; Video Hits One.

Fee: \$25.00 installation; \$17.60 monthly.

Pay Service 1

Pay Units: 77 (11/15/91). Programming (via satellite): Cinemax. Fee: \$10.00 installation; \$10.50 monthly.

Pay Service 2

Pay Units: 30 (11/15/91). Programming (via satellite): Disney Chan-

Fee: \$10.00 installation; \$10.50 monthly,

Pay Service 3

Pay Units: 134 (11/15/91). Programming (via satellite): HBO.

Fee: \$10.00 installation; \$10.50 monthly. Miles of plant: 7.0 (coaxial). Homes passed: 320. Total homes in franchised area: 320.

Manager, Keith Swain.

City fee: 3% of gross. Ownership: Tele-Communications Inc. (MSO). Purchased from American Televenture Corp., 1992.

EADS-Vantage Cable Assoc. L.P., Suite 200, 2708 Grand Ave., Des Moines, IA 50312. Phone: 515-243-2441. County:

Kiowa. Population: 878. TV Market Ranking: Outside TV Markets. Original franchise award date: N.A. Franchise expiration date: September 8, 1996. Began: October 8, 1982.

Channel capacity: 36. Channels available but not in use: N.A.

Basic Service

Subscribers: 277 (11/30/91).

Programming (received off-air): KKTV (C), KOAA-TV (N), KRDO-TV (A), KTSC (P) Colorado Springs-Pueblo; KCNC-TV (N), KMGH-TV (C), KRMA-TV (P), KUSA-TV (A), KWGN-TV (I) Deriver. Programming (via satellite): WTBS (I) At-

lanta; WGN-TV (I) Chicago; CNN; Discovery Channel; ESPN; Family Channel; Nashville Network; QVC Network; Turner Network TV; USA Network.

Fee: \$30,00 installation: \$20.95 monthly. \$3,50 monthly (each additional set).

Pay Service 1

Pay Units: 54 (11/30/91). Programming (via satellite): Disney Chan-

TV & Cable Factbook No. 61

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Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

In re Application of)	
• •)	File No. BPET-900122KE
University of Southern Colorado)	TVED
Licensee of Station KTSC(TV))	
Channel *8)	
Pueblo, Colorado)	DEC - 4 1992

To: Chief, Mass Media Bureau

FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

PETITION FOR ISSUANCE OF ORDER TO SHOW CAUSE

KKTV, Inc. licensee of television station KKTV, Channel 11, Colorado Springs, Colorado ("KKTV"), by its attorneys and pursuant to Section 312 of the Communications Act and Sections 1.41 and 1.91 of the Commission's Rules, hereby requests that the Commission issue an Order to Show Cause directing the University of Southern Colorado ("USC") to show cause why the above-captioned construction permit should not be revoked. In support of its Petition, KKTV submits the following:

I. SUMMARY

- 1. KKTV submits that the requested Order to Show Cause should be issued due to a material change in the facts upon which USC relied to support issuance of the above-captioned construction permit. As a result of these changed facts, the sole basis for granting the application no longer exists.
- 2. Specifically, USC has announced that it will exchange its non-commercial channel with the commercial channel of station KOAA-

TV, Channel 5, Pueblo, Colorado, licensed to Sangre de Cristo Communications, Inc. ("KOAA-TV"), and that USC will never construct or operate the facilities authorized in the above-captioned application as a non-commercial station. In addition, the timing of the announced channel exchange strongly suggests that USC and KOAA-TV had agreed to this arrangement prior to or during the time that the above-captioned application was pending. If so, USC was under an obligation, pursuant to Section 1.65 of the Commission's Rules, to advise the Commission of this material change in circumstances prior to grant of the above-captioned application. USC's failure to do so amounts to a serious violation of Section 1.65.

3. KKTV, therefore, submits that the facts of this case require that the Commission issue an Order to Show Cause directing USC to show cause why an order of revocation should not be issued for the above-captioned construction permit.

II. BACKGROUND

4. KKTV is licensed to Colorado Springs, Colorado. KKTV competes with other commercial television stations, including television station KOAA-TV, in the Colorado Springs-Pueblo market for advertising revenues. Because it is clear that KOAA-TV will be the sole beneficiary of the modification of facilities approved here, KKTV has standing to file this Petition. Sanders Brothers Radio Station v. FCC, 309 U.S., 642 (1940). The Commission should consider this Petition on its merits as an informal request for